

# **Exhibit E**

UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW JERSEY

**IN RE: JOHNSON & JOHNSON TALCUM  
POWDER PRODUCTS MARKETING, SALES,  
PRACTICES AND PRODUCTS LIABILITY  
LITIGATION**

KRISTY POOLE AND DEMETRIUS POOLE,

Plaintiffs,

v.

JOHNSON & JOHNSON AND JOHNSON &  
JOHNSON CONSUMER, INC.,

Defendants.

**MDL No. 2738 (FLW) (LHG)**

COMPLAINT AND JURY  
DEMAND

Civil Action No.: 3:19-cv-14040  
DIRECT FILED ACTION

**NOTICE PURSUANT TO CMO 9 - STATUS OF DECEASED PLAINTIFFS**

Plaintiff, through undersigned counsel, pursuant to CMO 9 – Status of Deceased Plaintiffs, dated September 1, 2023, hereby files this notice explaining the status of efforts to substitute party plaintiff and file an amended complaint:

1. Plaintiff died on December 5, 2019.
2. Undersigned counsel has made every reasonable effort to work with the surviving family members to identify the appropriate prospective estate representative, proceed with the opening of an estate, and file an amended complaint with the appropriate substituted party plaintiff.
3. As of the date of this filing, the family has retained a probate attorney, the Petition for Probate of Will and Appointment of Independent Executor was filed on January 16, 2024, and the appointment should be entered in the immediate future. At such time, undersigned counsel will immediately comply with the requirements of CMO 9.

4. Undersigned counsel hereby requests an extension of time until May 29, 2024 to comply with CMO 9.

Dated: 2/15/2024

Respectfully Submitted by,

/s/ W. Cameron Stephenson  
W. Cameron Stephenson  
Florida Bar No.: 0051599  
LEVIN, PAPANTONIO, RAFFERTY,  
PROCTOR, BUCHANAN, O'BRIEN, BARR &  
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ATTORNEY FOR THE PLAINTIFF

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 15th day of February 2024, a true and correct copy of the forgoing was filed with the Clerk of the Court by using the CM/ECF system. Service of this filing will be made on all ECF-registered counsel by operation of the Court's electronic filing system.

/s/ W. Cameron Stephenson